

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

SOUTH CAROLINA STATE CONFERENCE OF  
THE NAACP;

*Plaintiff,*

v.

TONNYA K. KOHN, in her official capacity  
as South Carolina State Court  
Administrator;

DONALD W. BEATTY, in his official capacity  
as Chief Justice of the South Carolina  
Supreme Court;

*Defendants.*

Case No.: 3:22-cv-01007-MGL

**Plaintiff's Local Rule 26.01  
Interrogatory Responses**

Plaintiff South Carolina NAACP hereby responds to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE: None.**

B. As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: Plaintiffs seek equitable relief, which should be tried to the Court.**

C. State whether the party submitting these responses is a publicly-owned company and separately identify, (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: No plaintiff is a publicly-owned company. Additionally, no plaintiff has a parent corporation or any stockholders.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01 (D.S.C.).

**RESPONSE: Plaintiffs filed this case in the Columbia Division because the defendants engage in their official responsibilities in the Columbia division and a substantial part of the events or omissions giving rise to the claims occurred in the Columbia division.**

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: No.**

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: N/A**

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: N/A**

Dated: March 30, 2022

Respectfully Submitted,



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\* *pro hac vice motion forthcoming*

*Counsel for Plaintiff*